

Exhibit 8

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

HEADWATER RESEARCH LLC

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD and
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

Case No. 2:23-CV-00641-JRG-RSP

JURY TRIAL DEMANDED

SAMSUNG’S P.R. 4-1 LIST OF PROPOSED TERMS FOR CONSTRUCTION

Pursuant to Patent Rule 4-1 and the Court’s Docket Control Order (Dkt. No. 44), Defendants Samsung Electronics Co. Ltd. and Samsung Electronics America, Inc. (collectively, “Samsung”) identify the following list of claim terms, phrases, or clauses which Samsung contends should be construed or found indefinite by the Court or governed by 35 U.S.C. § 112(6).

Samsung’s list was compiled based in part on Plaintiff Headwater Research, LLC’s (“Headwater”) apparent view of the scope of the claims as identified in Headwater’s P.R. 3-1 infringement contentions and accompanying claim charts served on May 15, 2024, and as purportedly amended on August 20, 2024, and again on November 1, 2024. Headwater’s P.R. 3-1 contentions are inadequate and fail to properly identify how Samsung’s accused instrumentalities meet certain elements of the asserted claims. Samsung reserves the right to modify the list below based on any supplemental contentions served by Headwater should Headwater seek to amend its contentions.

In addition, Samsung’s list was compiled prior to receiving Headwater’s proposed list of terms to be construed or Headwater’s proposed claim constructions. Accordingly, Samsung

reserves the right to modify the list below in light of Headwater's list of terms for construction or proposed claim constructions. Samsung also reserves the right to include within its list of proposed terms for construction the terms included on Headwater's list of proposed claim terms for construction. Samsung will work with Headwater on the preparation of a joint claim construction and prehearing statement pursuant to Patent Rule 4-3 and the Court's Docket Control Order.

I. U.S. Patent No. 8,588,110

Proposed Terms for Construction:

Claim Term	Claim(s)	Indefinite
the first wireless network	26, 27	X
low-level policy agents	12, 13	X
low-level policy rule	12	X
the interface	19	X
first service activity is non-critical	9	X
identify[ing] an intended, attempted, or successful data communication	1, 3, 4, 26, 27	X

Claim(s) Governed by 35 U.S.C. § 112(6): Claim 26

II. U.S. Patent No. 8,639,811

Proposed Terms for Construction: None

Claim(s) Governed by 35 U.S.C. § 112(6): None

III. U.S. Patent No. 9,179,359

Proposed Terms for Construction:

Claim Term	Claim(s)	Indefinite
the applied WWAN differential traffic control policy	1, 27	X
the differential traffic control policy	3, 4, 5, 6, 21, 22	X
the type of network connection	7, 8	X
the application of the stored WWAN differential traffic control policy	17, 18, 19, 20	X
the WWAN differential traffic control policy	25	X

Claim(s) Governed by 35 U.S.C. § 112(6): None

IV. U.S. Patent No. 9,647,918

Proposed Terms for Construction:

Claim Term	Claim(s)	Indefinite
application association information	7, 18	X
the calling device application	1, 14	X
to reconcile wireless network data usage for each of the plurality of device applications	1, 14	
the at least one wireless network	1, 19	X
the media object network data transfers	1, 2, 4, 13, 14, 15, 19	X
the service classification agent	6	X

Claim(s) Governed by 35 U.S.C. § 112(6): None

Dated: December 5, 2024

Respectfully submitted,

By: /s/ Sara C. Fish

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SAMSUNG ELECTRONICS AMERICA, INC.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on counsel of record for Plaintiff via electronic mail on December 5, 2024.

/s/ Sara C. Fish
Sara C. Fish